

Fill in this information to identify the case:

Debtor 1 Samuel Balbuena

Debtor 2 Rebecca Balbuena fka Rebecca Turek

United States Bankruptcy Court for the: Western District of Pennsylvania

Case number : 18-70874-JAD

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: NewRez LLC d/b/a Shellpoint Mortgage Servicing

Court claim no.
(if known):

38

Last 4 digits of any number you use to identify the debtor's account: 3420

Property Address: 1931 Menoher Boulevard
Johnstown, PA 15905

Part 2: Prepetition Default Payments

Check one:

☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is:

\$0.00

Part 3: Postpetition Mortgage Payment

Check one:

☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 2024-03-01

☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due:

(a) \$ 0.00

b. Total fees, charges, expenses, escrow, and costs outstanding:

+(b) \$ 0.00

c. **Total.** Add lines a and b.

(c) \$ 0.00

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

Debtor 1 Samuel Balbuena
First Name Middle Name Last Name

Case number (if known) 18-70874-JAD

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- all payments received;
- all fees, costs, escrow, and expenses assessed to the mortgage; and
- all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box:

☐ I am the creditor.

☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

/S/ Christopher Giacinto

Signature

Date 03/22/2024

Print: Christopher Giacinto

Title Authorized Agent for Creditor

Company Padgett Law Group

If different from the notice address listed on the proof of claim to which this response applies:

Address 6267 Old Water Oak Road, Suite 203

Tallahassee FL 32312

Contact phone (850) 422-2520

Email plginquiries@padgettlawgroup.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA
JOHNSTOWN DIVISION**

IN RE: SAMUEL BALBUENA,
REBECCA BALBUENA FKA REBECCA TUREK

No: 18-70874-JAD
CHAPTER 13

Debtor(s)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to the parties on the attached Service List by electronic service and/or by First Class U.S. Mail on this the 22nd day of March, 2024.

/S/ Christopher Giacinto

Christopher Giacinto
PADGETT LAW GROUP
6267 Old Water Oak Road, Suite 203
Tallahassee, FL 32312
(850) 422-2520 (telephone)
(850) 422-2567 (facsimile)
plginquiries@padgettlawgroup.com
Authorized Agent for Creditor

SERVICE LIST (CASE NO. 18-70874-JAD)

Debtor

Samuel Balbuena
1931 Menoher Blvd.
Johnstown, PA 15905

Joint Debtor

Rebecca Balbuena
1931 Menoher Blvd.
Johnstown, PA 15905

Attorney

Lawrence W. Willis
Willis & Associates
201 Penn Center Blvd
Suite 310
Pittsburgh, PA 15235

Trustee

Ronda J. Winnecour
Suite 3250, USX Tower
600 Grant Street
Pittsburgh, PA 15219

US Trustee

Office of the United States Trustee
1000 Liberty Avenue
Suite 1316
Pittsburgh, PA 15222